



**COLORADO**  
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**OF HEALTH**

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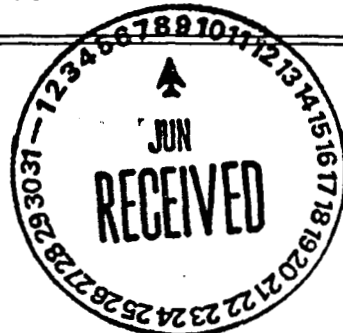
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May 29, 1992

Mr. Frazer Lockhart  
U. S. Department of Energy  
Rocky Flats Plant  
Building 116  
P. O. Box 928  
Golden, Colorado 80402



RE: Integration of RFI/RI Investigation and CHWA Closure Processes  
for Operable Unit 15

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) held an OU-15 scoping meeting on April 20, 1992 with DOE, EG&G and subcontractor representatives. Questions arose on the integration of RFI/RI investigation activities into previously proposed, IHSS specific, closure plans and the relevancy of those plans.

The IAG Statement of Work (SOW), Section I.B.11.a, specifies that "DOE shall submit closure plans to the State for all interim status units (IHSSs) undergoing closure within buildings (OU-15) in accordance with the CHWA, 6CCR 1007-3, Part 265." Closure of these IHSSs is to proceed in accordance with these regulations; thus, the closure plans are relevant provided they reflect the current conditions of the unit.

The intent of the IAG is that closure plans be the primary vehicle to achieve closure of the OU-15 "sources" in anticipation that neither soil, surface water nor ground water have been contaminated. It is thus expected that investigation under the closure plans (CHWA regulations, 6CCR 1007-3, Part 265) will provide sufficient information for the Division to determine if clean closure is possible or if further action is warranted. (Clean-closure may apply both to IHSSs where no releases occurred and to those with known or suspected releases. Closure in the latter situations would still be implemented through the closure plan with clean-closure as the goal.)

However, Section I.B.11.a further specifies that DOE shall submit a Phase I RFI/RI Workplan to EPA and the State. By fully complying with the CHWA closure regulations, DOE should also satisfy the characterization of nature and extent requirements of an RFI/RI investigation. Accordingly, the Closure Certification Report and the Phase I RFI/RI Report should be equivalent documents. If DOE wishes to submit a Closure Certification Report prior to submittal of the RFI/RI Report, the subsequent Report should merely summarize the closure investigation and closure activities of the specific IHSS.

If as expected by the nature of this OU, the Division and EPA determine that no further investigatory work is required, the RFI/RI Report may be approved as a Final RFI/RI Report. However, the IAG makes no specific provision for a combination of "no further action" IHSSs and those IHSSs that may require further

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investigation. Consequently, it may be in DOE's interest to submit two separate RFI/RI Reports, one for "no further action" IHSSs and another for any IHSSs where a Phase II effort becomes necessary.

DOE is scheduled to submit a draft Phase I RFI/RI Workplan on June 1, 1992. The Field Sampling Plan (FSP) portions specific to each IHSS, upon final approval, should be substituted for the source characterization sections of the previously proposed closure plans. (The only exception would be when the existing source characterization section of a closure plan is sufficient to characterize the unit. If this occurs, the source characterization section should then be incorporated identically into the FSP.)

The Division expects to approve the Phase I RFI/RI Workplan on November 24, 1992. We will then review the proposed closure plans, as expeditiously as possible, to determine their adequacy. DOE will have an opportunity to address the Division's comments, following which, a 30-day public comment period will be opened by the Division. The Division will respond to any comments and must grant final approval before DOE may proceed with the closure of the individual IHSSs.

If DOE wishes to close a specific IHSS on an accelerated schedule, the Division will review the relevant closure plan concurrent with its review of the Phase I RFI/RI Workplan. The closure plan, however, must represent the current operations and conditions of the unit before the Division will proceed with its review.

If you have any questions concerning this subject, please contact Division staff, Harlen Ainscough at 331-4977 or Joe Schieffelin at 331-4421.

Sincerely,



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